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May 12, 2006

Charles Anderson  
IFC Consulting  
1725 I Street, N.W.  
Suite 1000  
Washington, DC 20006

RE: Changes to Energy Star Requirements

Dear Mr. Anderson:

I would like to congratulate IFC Consulting and the EPA on the implementation of the Energy Star program with regard to roofing products. Gardner / APOC has been a supporter of this program since its inception and believes the entire roofing industry has benefited from this program. Within the roofing industry, the Energy Star Logo has quickly become a well-established and recognized mark which many people rely on for making important roofing decisions.

Since its inception, the Energy Star program for roofing products has grown substantially and it is understandable that many of the original rules and guidelines need to be evaluated as the program moves forward. This letter is in response to the proposed revisions seen in Draft 2 of Version 2.0 roof products specifications.

In reviewing the proposed revisions, Gardner / APOC has some concerns:

First, the proposed program is still allowing Manufacturers to "Self Certify" products. To be candid, it is surprising that a well-known and established organization like Energy Star is going to continue to allow manufacturers to provide their own test data. Allowing this to continue can lead to fraud and misrepresentation of data. This must be changed if the credibility of Energy Star wishes to remain intact.

Second, the additional requirement regarding emissivity is simply a bad idea. There are a number of products on the market today which would be eliminated from the current program if the proposed requirements are implemented. While these products would not qualify under the new Energy Star requirements, they are cost effective and perform

exceptionally well in reducing energy consumption and lowering cooling costs. There are a number of reasons for this, including climatic conditions and application, and there are studies available which document these findings. In fact, there are some areas of the country where the products being eliminated by an emissivity requirement actually perform better than products with high reflectance and high emittance values which would be accepted into the program. Changing the current requirements of the Energy Star program would create an injustice to the market and the customers that depend on these products every day.

In closing, Gardner / APOC recommends that:

1. A new procedure is implemented under which manufacturers are required to have all listed products independently tested by approved laboratories, similar to the CRRC program.
2. EPA remove any requirement for emissivity.

Thank you for your time regarding these matters and we look forward to your response.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bob Hyer", with a stylized, cursive script.

Bob Hyer  
VP Sales & Marketing

cc: Reed Hitchcock, RCMA  
Rachel Schmeltz, EPA  
Steven Ryan, EPA